

MCLAUGHLIN & STERN, LLP
FOUNDED 1898

JACQUELINE C. GERALD
Partner
jgerald@mclaughlinstern.com
Direct Phone: (212) 448-1100, ext. 1113

260 MADISON AVENUE
NEW YORK, NEW YORK 10016
(212) 448-1100
FAX (212) 448-0066
www mclaughlinstern.com

WESTFIELD, NEW JERSEY
GARDEN CITY, NEW YORK
MILLBROOK, NEW YORK
WESTPORT, CONNECTICUT
WEST PALM BEACH, FLORIDA
NAPLES, FLORIDA
SARASOTA, FLORIDA

February 3, 2025

VIA ECF

Hon. Arun Subramanian
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007

Re: *Matthew Muckey v. Associated Musicians of Greater New York, et. al.*
Case No. 1:24-cv-03348 (AS)(RWL)
[Related Case: *Liang Wang v. The Philharmonic-Symphony Society of New York, Inc. et al.*, Case No. 1:24-cv-03356 (AS) (RWL)]

Dear Judge Subramanian:

This firm represents MATTHEW MUCKEY (“Plaintiff”) in the above-referenced action against the defendants ASSOCIATED MUSICIANS OF GREATER NEW YORK, LOCAL 802, AMERICAN FEDERATION OF MUSICIANS and THE PHILHARMONIC-SYMPHONY SOCIETY OF NEW YORK, INC. a/k/a THE NEW YORK PHILHARMONIC ORCHESTRA (collectively “Defendants”). On behalf of Plaintiff and pursuant to Paragraph 11(B) and (C)(ii)–(iii) of this Court’s Individual Practices in Civil Cases, we write to respectfully request permission to (i) file under seal an unredacted copy of the arbitration opinion and award (the “Award”) that this Court directed Plaintiff to submit to the Court in its Order dated January 28, 2025 (ECF #73); and (ii) to file an unsealed version of that document that is redacted to the same extent as it is publicly redacted in the case of *Wang v. Sussman et al.*, Case No. 1:24-cv-03987(AS)(RWL).

We join in the request filed by Liang Wang in the related case, *Liang Wang v. The Philharmonic-Symphony Society of New York*, and respectfully refer this Court to the filings submitted in that case on February 3, 2025, under Document Numbers 78, 79 and 80 to support the instant application to seal.

Defendants consent to the request to seal.

Thank you for your consideration.

Respectfully submitted,

/s/ Jacqueline C. Gerald

By: Jacqueline C. Gerald

cc: All Counsel of Record (Via ECF)

The request is GRANTED.

The Clerk of Court is directed to terminate the motion at Dkt. 76.

SO ORDERED.



Arun Subramanian, U.S.D.J.

Dated: February 4, 2025